

The Honorable Barbara J. Rothstein

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

Case No. 2:25-cv-00685-BJR

*In re Laboratory Services Cooperative Data  
Breach Litigation*

**ORDER GRANTING PLAINTIFFS’  
JOINT UNOPPOSED MOTION FOR  
APPOINTMENT OF INTERIM  
CLASS COUNSEL PURSUANT TO  
FRCP 23(G)**

THIS MATTER, having come before the Court by Plaintiffs’ Motion for Appointment of Lead Counsel Pursuant to FRCP 23(g) and supporting materials, the criteria set forth in Federal Rule of Civil Procedure 23(g), IT IS ORDERED that the Motion is GRANTED as set forth below.

1. The Court hereby appoints Cecily C. Jordan of Tousley Brain Stephens PLLC and Thomas E. Loeser of Cotchett, Pitre & McCarthy, LLP as Interim Co-Lead Class Counsel, and Raina Borrelli of Strauss Borrelli PLLC, M. Anderson Berry of the Arnold Law Firm, Samantha E. Holbrook of Shub Johns & Holbrook LLP, Sabita J. Soneji of Tycko & Zavareei LLP, Yana Hart of Clarkson Law Firm, and Lori G. Feldman of George Feldman McDonald PLLC to serve on Plaintiffs’ Steering Committee (“PSC”) to act on behalf of the Plaintiffs and the putative class of online content creators with the responsibilities set forth below:

ORDER GRANTING PLAINTIFFS’ JOINT UNOPPOSED MOTION  
FOR APPOINTMENT OF INTERIM CLASS COUNSEL PURSUANT  
TO FRCP 23(G) - 1

Case No. 2:25-cv-00685-BJR

TOUSLEY BRAIN STEPHENS PLLC  
1200 Fifth Avenue, Suite 1700  
Seattle, Washington 98101  
TEL. 206.682.5600 • FAX 206.682.2992

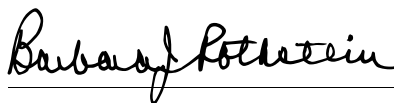
- a. To oversee case management and develop and implement a litigation plan, including strategic planning in all respects relating to Class claims, which shall be directed via careful oversight and management of all work on behalf of the Class;
- b. To draft, authorize, sign and file all pleadings and motions related to all actions on behalf of the Class, including but not limited to all cases consolidated in this Court, and any appellate or amicus briefs;
- c. To assess and select class representatives and determine the claims brought on behalf of the Class;
- d. To communicate with plaintiffs and the Class regarding the status of the pending action;
- e. To propound, seek and respond to discovery, including but not limited to written discovery, the taking or defending of depositions, and motion practice related thereto;
- f. To conduct informal discovery, including but not limited to informal investigation and related activities needed to support plaintiffs' claims;
- g. To take steps necessary to effectuate litigation to pursue Class claims, including managing document review and analysis and any other logistical matters that support formal and informal discovery efforts in this action;
- h. To retain vendors, experts and consultants on behalf of the Class;
- i. To enter into stipulations, agreements and joint prosecution agreements on behalf of the Class;
- j. To implement and enforce a protocol for attorneys' fees, expenses, and/or costs for the Court's approval to ensure that fees, expenses, and/or costs incurred are reasonable and necessary to the litigation;

- k. To engage in settlement discussions and enter into settlement on behalf of the Class and to propose a plan of allocation;
- l. To coordinate with plaintiffs' counsel in management of the litigation and fund the necessary and appropriate costs of discovery and other common benefit efforts;
- m. To allocate fees and expenses among Class Counsel and any other counsel whose engagement has been approved by the Court for purposes of any submission to the Court for reimbursement and compensation, and following the award of any such fees and expenses, for disbursement to counsel, including the determination for common benefit work; and
- n. To conduct all tasks ancillary and necessary to the above duties and any other duty as the Court may order.

2. Cecily C. Jordan of Tousley Brain Stephens PLLC and Thomas E. Loeser of Cotchett, Pitre & McCarthy, LLP are hereby designated as Interim Co-Lead Class Counsel, and Raina Borrelli, Anderson Berry, Samantha E. Holbrook, Sabita Soneji, Yana Hart, and Lori G. Feldman are designated to serve on Plaintiffs' Steering Committee ("PSC") pursuant to Federal Rule of Civil Procedure (g) to "act on behalf of a putative class before determining whether to certify the class as a class action." Fed. R. Civ. P. 23(g)(3).

3. Unless otherwise ordered by the Court upon a showing of good cause, this Order shall apply to any action filed, transferred to, or removed to this Court which relates to the subject matter at issue is the above-captioned cases.

ORDERED this 6th day of June 2025.



The Honorable Barbara J. Rothstein  
UNITED STATES DISTRICT JUDGE

1 Jointly Presented by:

2 TOUSLEY BRAIN STEPHENS PLLC

3 By: /s/ Cecily C. Jordan

4 Cecily C. Jordan, WSBA #50061  
5 Jason T. Dennett, WSBA #30686  
6 1200 Fifth Avenue, Suite 1700  
7 Seattle, Washington 98101  
8 Telephone: (206) 682-5600  
9 Facsimile: (206) 682-2992  
10 jdennett@tousley.com  
11 cjordan@tousley.com

8 COTCHETT, PITRE & McCARTHY, LLP

9 By: /s/ Thomas E. Loeser

10 Thomas E. Loeser, WSBA # 38701

11 By: /s/ Karin Swope

12 Karin B. Swope, WSBA # 24015  
13 1809 7th Avenue, Suite 1610  
14 Seattle, WA 98101  
15 Telephone: (206)-802-1272  
16 Facsimile: (206)-299-4184

14 STRAUSS BORRELLI PLLC

15 Samuel J. Strauss, WSBA #46971  
16 Raina Borrelli (Pro Hac Vice forthcoming)  
17 One Magnificent Mile  
18 980 N. Michigan Avenue, Suite 1610  
19 Chicago, IL 60611  
20 Telephone: (872) 263-1100  
21 Facsimile: (872) 263-1109  
22 sam@straussborrelli.com  
23 raina@straussborrelli.com

20 CLARKSON LAW FIRM, P.C.

21 Ryan Clarkson, Esq. (Pro Hac Vice forthcoming)  
22 Yana Hart, Esq. (Pro Hac Vice forthcoming)  
23 Bryan P. Thompson, Esq. (Pro Hac Vice forthcoming)  
24 22525 Pacific Coast Highway  
25 Malibu, CA 90265  
26 Telephone: (213) 788-4050  
rclarkson@clarksonlawfirm.com  
yhart@clarksonlawfirm.com  
bthompson@clarksonlawfirm.com

26 SHUB JOHNS & HOLBROOK LLP

Jonathan Shub (Pro Hac Vice forthcoming)

ORDER GRANTING PLAINTIFFS' JOINT UNOPPOSED MOTION  
FOR APPOINTMENT OF INTERIM CLASS COUNSEL PURSUANT  
TO FRCP 23(G) - 4

Case No. 2:25-cv-00685-BJR

1 Benjamin F. Johns (Pro Hac Vice forthcoming)  
Samantha E. Holbrook (Pro Hac Vice forthcoming)  
2 Andrea L. Bonner (Pro Hac Vice forthcoming)  
Four Tower Bridge  
3 200 Barr Harbor Drive, Suite 400  
Conshohocken, PA 19428  
Telephone: (610) 477-8380  
4 jshub@shublawayers.com  
bjohns@shublawayers.com  
5 sholbrook@shublawayers.com

6 TYCKO & ZAVAREEI LLP

7 Sabita Soneji (Pro Hac Vice forthcoming)  
1970 Broadway, Suite 1070  
8 Oakland, CA 94612  
Telephone: (510) 254-6808  
9 Facsimile: (202) 973-0950  
ssoneji@tzlegal.com

10 ALMEIDA LAW GROUP LLC

11 David S. Almeida (Pro Hac Vice forthcoming)  
849 W. Webster Avenue  
12 Chicago, IL 60614  
Telephone: (312) 576-3024  
13 david@almeidawgroup.com

14 MILBERG COLEMAN BRYSON PHILLIPS GROSSMAN, PLLC

15 Gary M. Klinger (Pro Hac Vice forthcoming)  
227 W. Monroe Street, Suite 2100  
16 Chicago, IL 60606  
Telephone: (202) 429-2290  
17 gklinger@milberg.com

18 John J. Nelson (Pro Hac Vice forthcoming)  
402 W Broadway, Suite 1760  
19 San Diego, CA 92101  
Telephone: (858) 209-6941  
20 jnelson@milberg.com

21 CHESTNUT CAMBRONNE PA

22 Bryan L. Bleichner (Pro Hac Vice forthcoming)  
23 Philip Krzeski (Pro Hac Vice forthcoming)  
100 Washington Avenue South, Suite 1700  
24 Minneapolis, MN 55401  
Telephone: (612) 339-7300  
25 bbleichner@chestnutcambronne.com  
pkrzeski@chestnutcambronne.com

26 HAGENS BERMAN SOBOL SHAPIRO LLP

ORDER GRANTING PLAINTIFFS' JOINT UNOPPOSED MOTION  
FOR APPOINTMENT OF INTERIM CLASS COUNSEL PURSUANT  
TO FRCP 23(G) - 5

Case No. 2:25-cv-00685-BJR

1 Steve W. Berman, WSBA #12536  
2 1301 Second Avenue, Suite 2000  
3 Seattle, WA 98101  
4 Telephone: (206) 623-7292  
5 Facsimile: (206) 623-0594  
6 steve@hbsslaw.com

7  
8  
9 GEORGE FELDMAN MCDONALD, PLLC

10 Lori G. Feldman, WSBA #29096  
11 102 Half Moon Bay Drive  
12 Croton-on-Hudson, NY 10520  
13 Telephone: (917) 983-9321  
14 lfeldman@4-justice.com  
15 eservice@4-justice.com

16 EMERY REDDY, PLLC

17 Timothy W. Emery, WSBA No. 34078  
18 Patrick B. Reddy, WSBA No. 34092  
19 Brook E. Garberding, WSBA No. 37140  
20 Paul Cipriani, WSBA No. 59991  
21 600 Stewart Street, Suite 1100  
22 Seattle, WA 98101  
23 Telephone: (206) 442-9106  
24 Facsimile: (206) 441-9711  
25 emeryt@emeryreddy.com  
26 reddyp@emeryreddy.com  
brook@emeryreddy.com  
paul@emeryreddy.com

CLAYEO C. ARNOLC  
A PROFESSIONAL CORPORATION

M. Anderson Berry, WSBA No. 63160  
Gregory Haroutunian (Pro Hac Vice forthcoming)  
Brandon P. Jack (Pro Hac Vice forthcoming)  
865 Howe Avenue  
Sacramento, CA 95825  
Telephone: (916) 239-4778  
Facsimile: (916) 924-1829  
aberry@justice4you.com  
gharoutunian@justice4you.com  
bjack@justice4you.com